

### **REMARKS**

Claims 1-30 are in the application. By this amendment, Claims 1, 10, 12 and 13 are amended. All claims stand rejected.

#### **Claim Rejections Under 35 U.S.C. §103**

Claims 1-27, 29 and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Okamoto (U.S. Patent 6,587,760) in view of Fischer et al. (U.S. Patent 7,089,101). The Examiner has also rejected each of these claims on the reverse combination.

The Examiner states that Okamoto discloses a parking system using images of a vehicle, and its environment, projected on a screen. In other words, the image of the vehicle is shown on the screen along with its surroundings. The Examiner admits that Okamoto teaches nothing regarding the use of a system with a trailer. For that, the Examiner looks to Fischer which, the Examiner asserts, teaches:

"During the driving maneuver, the steering wheel position which the driver has to set in order that the actually registered trailer angle Bact corresponds to the desired trailer angle Bdes is displayed to the driver."

The Examiner concludes with the argument that:

"One having ordinary skill in the art at the time of the invention would have found it obvious to have modified the system of Okamoto to include the ability to park the vehicle while towing a trailer, as taught by Fischer et al.,...."

Applicants respectfully traverse this rejection and request that each of Claims 1-30 be reconsidered in view of these remarks and passed to issue over the Examiner's rejection.

Applicants respectfully submit that neither Okamoto nor Fischer, whether taken singly or in combination with each other, either teach or suggest Applicants' claimed invention. As set

forth in independent Claims 1, 12, and 21, Applicants' invention is directed to a method and system for determining the predicted position of a trailer relative to a tow vehicle based on the current position of the trailer with respect to the vehicle and the steering wheel angle. This predicted position is displayed within the vehicle, along with the current position of the trailer with respect to the vehicle. In other words, what Applicants are describing as a vehicle having a hinge point in the middle, with the hinge point being the hitch located at the hitch ball joining a trailer to the vehicle. Applicants' method allows the vehicle operator to observe the current position of the trailer with respect to the vehicle and a predicted position of the trailer with respect to the vehicle.

In contrast with the claimed invention as set forth first in independent Claims 1 and 12, Okamoto teaches a system for displaying the vehicle and its surroundings and an image on a screen. What is predicted is the movement of the vehicle with respect to its surroundings. Of course, Okamoto can't teach anything regarding a vehicle having two parts to it, with a hinge in between, because Okamoto is devoid of any teaching or suggestion regarding application of its system to a trailer. Okamoto deals only with the positioning of the vehicle with respect to the outside world; Okamoto teaches nothing regarding intra-vehicle issues. Fischer, on the other hand, teaches a system which may be used for tracking the angle of a trailer with respect to a vehicle. Note, however, that Fischer is a feedback system and not a feed-forward system. Fischer merely tells the driver what the departure is from the desired angle of trailer towing. Fischer neither teaches nor suggests anything regarding predicting the path of a trailer or, for that matter, predicting the angle of the trailer with respect to the motor vehicle. Fischer is only a reporting device and lacks any predictive capability. Because Okamoto teaches nothing regarding the attitude of a vehicle with respect to itself, and because Fischer teaches nothing

regarding predicting any attitude of any part of a vehicle with respect to itself, the two teachings are not properly combined and, indeed, even if they were, one would have perhaps a system which shows a position of the vehicle on the ground, but has no predictive capability for showing if a trailer is on its way to a “jackknife” situation with respect to a tow vehicle. As a result, each of the claims in this case, i.e., Claims 1-30, are allowable and should be passed to issue over the Examiner’s rejection. Finally, Claim 28, which depends from Claim 21 is subject to the same base rejection, supplemented by Yoshioka, but Yoshioka cannot remedy the deficiencies noted above in connection with the combination of Okamoto and Fischer.

#### **Claim Rejections Under 35 U.S.C. §112**

It is noted that the Examiner’s rejection of Claims 1 and 12 pursuant to 35 U.S.C. §112, second paragraph, has been overcome with the amendment to these claims, which makes clear that the predicted position of the trailer is relative to the vehicle.

**Concluding Remarks**

Reconsideration of this application as amended is respectfully requested.

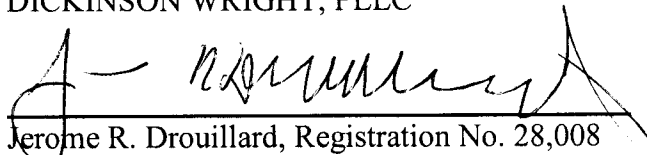
It is believed that this application is now in condition for allowance. Further and favorable action is requested.

The Patent Office is authorized to charge any fee deficiency or refund any excess to Deposit Account No. 06-1510.

Respectfully submitted,

DICKINSON WRIGHT, PLLC

9/19/07  
Date

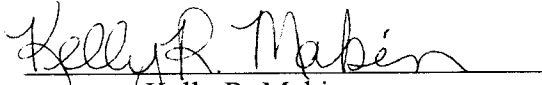
  
Jerome R. Drouillard, Registration No. 28,008  
38525 Woodward Avenue, Ste. 2000  
Bloomfield Hills, Michigan 48304-2970  
734-623-1698

Certificate of Mailing Under 37 C.F.R. 1.10

I hereby certify that this correspondence is being deposited via electronic submission on the USPTO website.

Commissioner for Patents  
PO BOX 1450  
Alexandria, Virginia 22313-1450

on 09-19-07

  
Kelly R. Makin